

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MEREDITH PARENTE,)
)
Defendant.)
_____)

Civil Action No. 2:11-cv-01420 MRH

JOINT ENTRY OF PROPOSED CONSENT JUDGMENT

Plaintiff, the United States of America, and Defendant, Meredith Parente, hereby jointly move
for entry of the attached Consent Decree.

Respectfully submitted,

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Assistant Attorney General
Civil Rights Division

JONATHAN M. SMITH
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/s/ Aaron S. Fleisher

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MEREDITH PARENTE,)	
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Defendant.)	
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CONSENT JUDGMENT

Plaintiff, the United States of America, and Defendant, Meredith Parente, hereby agree and consent to judgment against Defendant as follows:

1. Defendant is PERMANENTLY ENJOINED from being physically located within 25 feet of the existing buffer zone established by Pittsburgh, Pa., Code Title. 6, § 623.04, around the Planned Parenthood of Western Pennsylvania Liberty Avenue, located at 933 Liberty Avenue in Pittsburgh, Pennsylvania.
 - a. The existing buffer zone is marked by a painted yellow semi-circle in front of the entrance of 933 Liberty Avenue.
 - b. When facing 933 Liberty Avenue, the permanent injunction prevents Defendant Parente from being physically located within 25 feet to the left of the existing buffer zone, or from being physically located within 25 feet to the right of the existing buffer zone. The injunction is not meant to prevent Defendant Parente from being in a vehicle on the street driving past 933 Liberty Avenue within 25 feet of the existing buffer zone.

- c. To the left of the existing buffer zone, Defendant Parente is not permitted to be physically located any closer than the furthest edge of 931 Liberty Avenue.
 - d. To the right of the existing buffer zone, Defendant Parente is not permitted to be physically located any closer than the doorway of 937 Liberty Avenue.
 - e. Attached as Exhibit 1 is a photograph of the outside area of 933 Liberty Avenue. The proposed permanent injunction is marked by two red boxes on either end of the existing buffer zone.
2. Defendant Parente and any others acting under her instruction or direction are PERMANENTLY ENJOINED from violating the Freedom of Access to Clinic Entrances Act, 18 U.S.C. § 248 (1994).
3. Five years from the date of the Order Approving the Consent Judgment, Defendant may move for good cause to dissolve the Consent Judgment. Good cause requires a showing that:
- a. Defendant has not committed any violations under the Freedom of Access to Clinic Entrances Act, 18 U.S.C. § 248;
 - b. Defendant has not violated the terms of the Consent Order; and
 - c. Defendant has not violated any buffer zone in Pittsburgh established by Pittsburgh, Pa., Code Title. 6, § 623.04.
4. This Consent Judgment reflects a compromise of the disputed claims. No party admits liability to the other party.

Date: 10/29/12

Respectfully submitted,


MEREDITH PARENTE



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